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**UNITED STATES DISTRICT COURT
DISTRICT OF THE NORTHERN MARIANA ISLANDS**

UNITED STATES of AMERICA,

Plaintiff,

v.

EDWARD LEE SANTOS,

Defendant.

Case No.: CR 08 - 00011

**GOVERNMENT'S NOTICE OF INTENT
TO INTRODUCE EXPERT TESTIMONY**

The United States of America, by and through undersigned counsel, hereby gives notice to the defendant that, pursuant to Rule 16(a)(1)(G) Fed.R.Crim.P. and Rule 702 of the Federal Rules of Evidence, it intends to introduce expert testimony at trial from Special Agent John N.Q. Quintanilla of the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives. Special Agent Quintanilla is expected to provide testimony based upon his review of evidence and documents in this case. His testimony also

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2 is expected to be based upon his research, training and experience in law enforcement;
3 criminal investigations; firearms; and establishing the identification, origin, classification, and
4 interstate nexus of firearms and ammunition.

5 Special Agent Quintanilla is expected to provide testimony relating to the physical
6 evidence in the instant case, as well as the manufacturer; model; caliber/gauge; serial number;
7 proof and other identifying marks; and appearance of the weapons, ammunition, and carrying
8 case involved in the instant case. Additionally, he is expected to provide testimony related to
9 the place of manufacture, function, design and status of the weapons in the instant case with
10 respect to the Gun Control Act. Special Agent Quintanilla is also expected to testify
11 regarding firearms traces and norms within the firearms industry. Further, based upon the
12 aforementioned considerations, Special Agent Quintanilla is expected to opine that the
13 weapons in the instant case traveled in interstate commerce.
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15 Respectfully submitted this 5th day of May, 2008.

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17 LEONARDO M. RAPADAS
18 United States Attorney
19 Districts of Guam and the Northern Mariana Islands

20 /s/ Beverly R. McCallum
21 BEVERLY R. McCALLUM
22 Assistant United States Attorney
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